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United States Court of Appeals
District of Columbia Circuit

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No. #

UNITED STATES COURT OF APPEALS

FOR THE DISTRICT OF COLUMBIA CIRCUIT

SEPTEMBER TERM 2017 A.D.

Sharon Bridgewater
Petitioner
Vs.
Donald Trump in his Official Capacity as
United States President

The White House
1600 Pennsylvania Avenue, N.W
Washington, D.C.20500 et al

Respondent

PETITION FOR REVIEW OF AN AGENCY, BOARD, COMMISSION AND/OR OFFICER

BRIEF FOR THE APPELLANT- COMPLAINT FOR COMMON LAW WRIT OF CERTIORARI

Sharon Bridgewater
Pro Se
18592 Dale Street
Detroit, Michigan 48219
Phone #1-313-471-8714
Appellant

Attorney for the above

Att F

CERTIFICATE AS TO PARTIES, RULINGS AND RELATED CASES

CORPORATE DISCLOSURE STATEMENT

Pursuant to FRAP 26.1 and DC Cir. Rules 27(a)(4) and 28(a)(1)(A), Appellant certifies as follows:

A.PARTIES

Appellants

Sharon Bridgewater the PETITIONER , is an prisoner with the I.D. # N/A, and whose Social Security Number is XXX-XX-2970, address is 18592 Dale Street, Detroit, MI 48219; and is a United States Citizen, and an African American, and attends church regularly; is a member of a religious group, and "protected class and/or race, class based discriminatory animus." Sharon Bridgewater is an University of Michigan Graduate (BA Degree) with some "Master Degree Credits."

Sharon Bridgewater Place of Confinement is as follows:

a. "Gwinnett County Detention Center – Probation violation via a State Court Judgment," and multiple warrants in various States including Michigan and Georgia and is"constructively confined" at the State of Georgia, and Michigan in violation of international laws and/or treaties. Sharon Bridgewater is a recipient of Social Security and have been under a legal disability since Jan. 1, 1993 and contining thru present due to willfull, intentional civil rights violations.

Standing

Sharon Bridgewater have been injured, and damaged; and have an "injury in fact"—an invasion of a legally protected interest which is concrete and particularized, and "actual or imminent," not "conjectural" or "hypothetical;" and there is casual connection between the injury and the conduct complained of—the injury is "fairly ... trace[able] to the challenged action and the injury will be "redressed by a favorable decision and have Article III standing."

JAMES SHANNON BRIDGEWATER THE PETITIONER SON

James Shannon Bridgewater PETITIONER , whose Social Security Number is XXX-XX-7959, address is 18592 Dale Street, Detroit, MI 48219; and is a United States Citizen, and an African American, and Attends church sometimes, is a member of a religious group, and member of a "protected class and/or race, class based discriminatory animus." James Shannon Bridgewater is an Ohio University Graduate University (BA Degree) with some "Master Degree Credits," was a licensed Real Estate Broker in the State of California.

At all times mentioned on or about Jan. 1, 1993 and/or Feb. 23, 1998, continuing thru to July 2013 the Petitioner was a victim of illegal immigration and further James and/or I founded, owned and operated one or more duly licensed companies Specialty Investment Group L.L.C., a Georgia Company, Specialty Global Investments Inc., a Nevada Corporation, and Bridgewater & Company Inc., a California Corporation, The

Coalition for Empowerment(formerly Greater Lansing Helping Hands)a 501C-3 non-profit organization, a Michigan and/or Georgia non-profit corporation, B & B Building Maintenance INC. a Michigan Corporation, and were “Executive Directors, Chief Executive Officers, President, duly licensed organized and existing under the laws of the State of California, State of Michigan and/or the State of Georgia with principle offices located at 965 Mission Street, San Francisco, CA, in the city of San Francisco, CA, County of San Francisco, 133 W. Michigan Ave. in the city of Ypsilanti, Michigan, County of Washtenaw, and 470 North Clayton Street, Suite 204 and 206, in the City of Lawrenceville, GA, County of Gwinnett. At were “ Minority Business Enterprises and/or a Women Business Enterprise - Disadvantaged Business[owned and controlled by one or more minority or socially and economically disadvantaged persons from cultural, racial, chronic economic circumstances or other similar causes and is owed by 51 percent or more African American]: The Petitioners competitor of one or more of the above Defendants and/or Obama in his official capacity as United States President. James Shannon Bridgewater Real Estate Broker, with an expired Real Estate license(expired just recently), and must pay $500.00 to renew his licensed.

Nature of Trade and Commerce; the complexities involved in the sale and transfer of Real Property have resulted in the development of a trade designed to assist both buyers and seller. Said Trade Offers itself to the general public to provide the services of soliciting prospective Sellers and/or Buyers for the sale or lease of real property, and for the financing of said property as specified in section 10131 California Business and Professional Code. It also provides for an experienced team of real estate professionals proficient in all aspects of commercial real estate investment, development, leasing, acquisitions, finance, asset management, and property management. It also provides for and/or consist of networking with Investors, attorneys, brokers, appraisers, developers, property managers, and/or general contractors, internet services, banking services, and a combination and directly engaged in the production, distribution, or acquisition of services, money, goods, or property that conducted "interstate commerce," between or among two or more states *(between a state and a foreign country)*. The Petitioner James and Sharon regulary have cell phones, had and continues to have e-mail accounts, have banking accounts, use computers regularly and are and At all times mentioned the Plaintiff Bridgewater had verbal agreement of $2,000,000.00(Two Million Dollars) and James Shannon Bridgewater was making in excess of $50,000.00 per year and his business was growing. James and Sharon were competitors, had an expressed or implied agreement with one or more of the Donald Trump et al and Does Defendants 7 thru 5000. These business are no longer in business due to the acts or omissions of Donald Trump and/or one or more of Does Defendants.

Standing

James Shannon Bridgewater have been injured, and damaged; and have an "injury in fact"—an invasion of a legally protected interest which is concrete and particularized, and "actual or imminent," not "conjectural" or "hypothetical;" and there is casual connection between the injury and the conduct complained of—the injury is "fairly ... trace[able] to the challenged action and the injury will be "redressed by a favorable decision and have Article III standing."

RETROACTIVE IMPLICATION OF THIS PEITITION FOR REVIEW AND TOLLING OF THE STATUE OF LIMITATION

Sharon Bridgewater) and/or James S. Bridgewater have been systematically deprived of their fun dental right to due process of law, (from Jan. 1 1993 and continuing thru present) as guaranteed by the Bill of Rights, and/or the Declaration of Human right, as long as said unconstitutional statues have been allowed to remain on the books a "retro-activity appear and practice in this court; as justice requires that this court review 'unlawful imprisonment" retro-activity. This is a continuing conspiracy to from Jan. 1, 1993 and continuing thru present deny and/or deprive the Plaintifff equal protection of the laws and/or equal priviledges and immunities under the law, and further is a continuing conspiracy between Barak H. Obama and/or Loretta Lynch to withhold money and/or property that rightfully belongs to the "Plaintiffs and/or Petitioners" and even further Plaintiffs are entitled to immediate declaratory and injunctive relief and is entitled to a Judgment as a matter of law. The Petitioner respectfully shows: that I am a victim of crime, and an "Whistleblower" has been damaged and continues to be damaged by the acts or omission of the above named Defendants Donald Trump and/or Jeff Sessions; "solely" because I exercised my US Constitutional rights, and continue to exercise my US Constitutional and hace been discriminated against on the basis race, class, national origin, to deny and/or deprive the Plaintiff of rights as defined in the Declaration for Human rights(and the United States Constitution), falsely imprisonment the Plaintiff Bridgewater, hold the Plaintiff to a condition of peonage and slavery in violation of International, Federal and/or State laws.

The Plaintiff has exhausted all available remedies and have no other adequate remedies at law. According, this court should issue a Writ of Habeas compelling Respondents either to release the Petitioner. The fourth Amendment to the United States condition provides: "The right of the people to be secure in their person, houses, papers, and effects against unreasonable searches and seizures, shall not be violated, an no warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized." The second amendment right guarantees the Plaintiff the right to bear arm, and this right shall not be infringed.

THE APPELLANT MAKES THIS APPLICATION FOR A PETITION FOR A WRIT OF HABEAS CORPUS AND/OR MANDUMUS, AND/OR "ALL WRITS," IN THIS UNITED STATES FEDERAL DISTRICT COURT AND THIS IS BROUGHT IN THIS US COURT OF APPEALS FOR THE DC CIRCUIT BECAUSE THIS PETITION CAN NOT BE MADE IN ANY OTHER COURT. ALL OF THE LAWSUITS AND/OR COMPLAINTS HAS BEEN "ERROURSLY DISMISSED AND THE THE APPELLANT HAS EXHAUSTED ALL AVAILABLE REMEDIES AND HAVE NO OTHER ADEQUATE REMEDIES AT LAW. EXCEPTIONAL CIRCUMSTANCES WARRANTS THE COURT DISCRETREATION; AS ADEGUATE RELIEF CAN NOT BE OBTAIN N ANY OTHER ORM OR FROM ANY OTHER COURT.

THIS DISTRICT COURT OF COLUMBIA IS A FEDERAL COURT ESTABLISHED BY OR UNDER ARTICLE III OF THE UNITED STATES CONSTITIUTION; THUS HAVE JUDICIAL POWERS OF THE UNITED STATES AND IS VESTED IN ONE SUPREME COURT AS THE CONGRESS ESTABLISHED AND ORDAIN. THIS COURT HAVE THE A POWER TO DECIDE "THIS CASE AND CONTROVERSY" VIA SHARON BRIDGEWATER VS. DONALD TRUMP ET AL VIA ARITLCE III SECTION 2 OF THE CONSTITUTION

Appellees:

Donald Trump in his Official Capacity
as United States President

The White House
1600 Pennsylvania Avenue, N.W
Washington, D.C.20500,

Jeff Sessions in his official capacity
as United States Attorney General

United States Department of Justice
950 Pennsylvania Ave, N.W.
Washington, D.C. 20530-0001,

Rex Tillerson in his official capacity as Secretary of State

United States Department of State
2201 C Street
Washington, DC 20520,

John Kelly in his official capacity as Director of Homeland Security

United States Department of Homeland Security
245 Lane SW
Washington, DC 20528,

Thomas E. Brandon in his official capacity as Acting Director of the United States Bureau of the Alcohol, Tobacco, FireArms and Explosives(ATF),

H.R. McMaster in his official capacity as National Security Advisor

National Security Counsel
The White House
1600 Pennyslvania Ave. N.W. Washington, DC 20500

AND DOES 7 THRU 5000

Donald Trump is the United States President charged with the affairs of the United States. Trump have an expressed or implied agreement and/or contracts with the above named Respondants and Does AND DOES 7 THRU 5000 and are associated with, corporations, groups, persons, foreign official(and a Class of International Defendants and/or Respondents).

B. Rulings under review

The Adminstrative action and/or Executive 13780 of Donald Trump in his official capacity as United States President , Homeland Security, Protecting the National from Foreign Terrorist entry into the United States entered on March 6, 2017 appears at https://www.whitehouse.gov/briefing-room/presidential-actions/executive-orders?term_node_tid_depth=51&page=1White and is submitted to this court in the Petition for review of a agency, board, commission and/or officer.

The Adminstrative action and/or Executive 13780 of Donald Trump in his official capacity as United States President , Homeland Security, Protecting the National from Foreign Terrorist entry into the United States entered on Jan. 27, 2017, 2017 appears at https://www.whitehouse.gov/briefing-room/presidential-actions/executive-orders?term_node_tid_depth=51&page=1White

and is reprinted and/or attached as addendum

C. RELATED CASES

Sharon Bridgewater PETITIONER/PLAINITIFF have begun other lawsuits in State and/or Federal and/or Appellant Courts relating to the same facts involved in this action as follows;

1. Filed: June 10, 2011 as 3:2011cv02828 -_Defendant: Social Security Administration Plaintiff: Sharon Bridgewater Cause Of Action: Petition for RemovalCourt:Ninth Circuit › California › California Northern District CourtType:Torts - Injury › Other Personal InjuryDisposition –DISMISSED

2. Filed: December 1, 2010 as 3:2010cv05436 - Defendant: Shawn Bankon, Jane Creason Kimball, Hayes Valley Limited Partnership and others Plaintiff: Sharon Bridgewater Cause Of Action: Fed. QuestionCourt:Ninth Circuit › California › California Northern District CourtType:Civil Rights › Other Civil RightsDisposition –DISMISSED

3. Filed: December 1, 2010 as Defendant: Housing Authority of Alameda County, United States Housing and Urban Development Plaintiff: Sharon Bridgewater Cause Of Action: Fed. QuestionCourt:Ninth Circuit › California › California Northern District CourtType:Civil Rights › Other Civil RightsDisposition -DISMISSED

4. Sharon Bridgewater v. DeKalb County, et alFiled: November 17, 2010 as 10-15276 - Plaintiff - Appellant: SHARON BRIDGEWATER Defendant - Appellee: DEKALB COUNTY, by and through Vernon Jones, Chief, N. T. MARTINELLI, Executive Officer; Chief of Police for the Dekalb County Police Department, C. SCHREINER, Police Officer; #2491; Individually and in her official capacity as the arresting Officer and others Court:Eleventh CircuitU.S. Court of Appeals, Eleventh CircuitType:Civil Rights › Other Civil RightsDisposition –DISMISSED – APPEALED – AND DISMISSED AGAIN

5. Bridgewater v. Tonna et al
   Filed: November 3, 2010 as 3:2010cv04966 Plaintiff: Sharon Bridgewater
   Defendant: Roger Tonna, Mary Tonna, William Gilg
   Cause Of Action: Fair Debt Collection Act
   Court:Ninth Circuit › California › California Northern District CourtType:Civil Rights › Other Civil Rights Disposition –DISMISSED

6. Bridgewater v. Hayes Valley Limited Partnership et alFiled: July 9, 2010 as 4:2010cv03022 - Plaintiff: Sharon Bridgewater Defendant: Hayes Valley Limited Partnership, McCormack Baron Ragan Management Services Inc., MBA Urban Development Co. and others Cause Of Action: Civil Rights ActCourt:Ninth Circuit › California › California Northern District CourtType:Civil Rights › Other Civil RightsDisposition –DISMISSED

7. Bridgewater v. DeKalb County et alFiled: April 12, 2010 as 1:2010cv01082 - JUDGEPlaintiff: Sharon Bridgewater Defendant: DeKalb County, N. T. Martinelli, C. Schreiner and others Cause Of Action: Civil Rights ActCourt:Eleventh Circuit › Georgia › Georgia Northern District CourtType:Civil Rights › Civil Rights: OtherDisposition - DISMISSEDAPPEALED TO THE US COURT OF APPEALS (GEORGIA)

8. Bridgewater v. Bankson et al Filed: February 18, 2010 as 3:2010cv00704 - Plaintiff: Sharon Bridgewater Defendant: Shawn Bankson, Jane Creason, Kimball Tirey & St. John, LLP Cause Of Action: Civil Rights ActCourt:Ninth Circuit › California › California Northern District CourtType:Torts - Property › Fraud or Truth-In-LendingDisposition –DISMISSED

9. Bridgewater v. Hayes Valley Limited Partnership et alFiled: February 18, 2010 as 3:2010cv00703 -Plaintiff: Sharon Bridgewater Defendant: Hayes Valley Limited Partnership, McCormack Baron Ragan Management Services Inc., MBA Urban Development Co. and others Cause Of Action: Civil RightsCourt:Ninth Circuit › California › California Northern District CourtType:Civil Rights › PlaintiffDisposition –DISMISSED

10. Bridgewater v. Hayes Valley Limited Partnership et alFiled: December 1, 2009 as 4:2009cv05663- Plaintiff: Sharon Bridgewater Defendant: Hayes Valley Limited Partnership, McCormack Baron Ragan Management Services Inc., MBA Urban Development Co. and others Cause Of Action: Civil Rights ActCourt:Ninth Circuit › California › California Northern District CourtType:Civil Rights › NoneDisposition – DISMISSED

11. Bridgewater v. Bankson et alFiled: August 7, 2009 as 3:2009cv03639 -Plaintiff: Sharon Bridgewater Defendant: Shawn Bankson, Jane Creason, Kimball, Tirey & St. John, LLP Cause Of Action: Fed. QuestionCourt:Ninth Circuit › California › California Northern District CourtType:Torts - Property › PlaintiffDisposition –DISMISSED

12. Bridgewater v. Gwinnett County State of Georgia et alFiled: August 4, 2009 as 1:2009cv02131 - Petitioner: Sharon Bridgewater Respondent: Gwinnett County State of Georgia, People of the State of Georgia Cause Of Action: Petition for Writ of Habeas Corpus (State)Court:Eleventh Circuit › Georgia › Georgia Northern District CourtType:Other StatutesDisposition –DISMISSED

13. Bridgewater v. Hayes Valley Limited Partnership et al - Filed: August 3, 2009 as 4:2009cv03551 Plaintiff: Sharon Bridgewater Defendant: Hayes Valley Limited Partnership, McCormack Baron Ragan Management Services Inc., MBA Urban Development Co. and others Cause Of Action: Civil Rights ActCourt:Ninth Circuit › California › California Northern District CourtType:Torts - Property › PlaintiffDisposition –DISMISSED

14. Bridgewater v. Hayes Valley Limited PartnershipFiled: December 17, 2008 as 3:2008cv05622 - Plaintiff: Sharon Bridgewater Defendant: Hayes Valley Limited Partnership Cause Of Action: DiversityCourt:Ninth Circuit › California › California Northern District CourtType:Contract › PlaintiffDisposition –DISMISSED

15. Bridgewater v. State of Georgia, County of GwinnettFiled: September 22, 2008 as 1:2008cv02971 Respondent: State of Georgia, County of Gwinnett - Petitioner: Sharon Bridgewater Cause Of Action: Petition for Writ of Habeas Corpus (State)Court:Eleventh Circuit › Georgia › Georgia Northern District CourtType:Prisoner Petitions › Habeas Corpus (General)Disposition –DISMISSED

16. State of Michigan vs. Sharon Bridgewater case # 122-1929 10/05/2012 (Washtenaw County 14A2 Judicial Disrict Court(resisting, obstructing officer)removed from State Court to #44 Federal Court OUTSTANDING WARRANT

17.. State of Michigan vs. James S. Bridgewater case # 15117148 SM –

18.State of Georgia vs. Sharon Bridgewater – Judge Randy Rich(Criminal) 11/20/2005(Gwinnett County Superior Court/Lawrenceville, GA) case # 06-d-03943-S2 – UNDER STATE OF GEORGIA CUSTODY

19. Committee and Oversight vs. Loretta Lynch case # 1:12 CV-1332(ABJ)

20.Klayman v. Obama 16-CV-80087(Lynch and/or Obama Gun Control).

21.Filed Dec. 9, 2011 by Sharon Bridgewater case # 1:11 CV-3828-)DE-ABJ –Sharon Bridgewater Vs. Randy Rich(Northern District Court for the District of Georgia)

22. .Filed On or about Jan. 1, 2011 by Sharon Bridgewater case # 1:11 CV-4088-)DE-ABJ – Sharon Bridgewater Vs. Lawrenceville, Police Department, Randy Rich(Northern District Court for the District of Georgia)

23. State of Texas et al. vs United States of America civil case No. B-14-254

24. Filed on August 4, 2008, entitled Sharon Bridgewater vs. Hayes Valley Limited Partnership case # CGC-08-478207

25. 0:16-cvus-05078 US Committee and Oversight vs. Loretta Lynch in her official Capacity as United States Attorney General

26. Case # 1:12-CV-01332(ABJ) Committee and Oversight vs. Loretta Lynch in his official capacity As United States Attorney General and/or Loretta Lynch in her official capacity as United States Attorney General

27. State of Texas, et al vs. United States of America, Department of Education; John B. King, JR. in his official capacity as States Secreatry of Education; United States Department of Justice; Loretta Lynch in her official capacity as United States Attorney General et al Case # 7:16-CV-00054-O

28. Judicial Watch, Inc. vs. Department of Sate 1:13-cv-01363-EGS

29. Judicial watch vs. Department of Justice 12-1510(JDB)

30. Case # 07-000915177 –State of Georgia vs. Sharon Bridgewater

31. Case # SX26752372 SI AND SX26752371 ST State of Michigan vs. James Shannon Bridgewater

32. Case # d-01—91-311 State of Georgia – Dekalb County vs. Sharon Bridgewater(Theft by Taking)

33. 0:16-cvus-05078 US Committee and Oversight vs. Loretta Lynch in her official Capacity as United States Attorney General

34. Tarequ Aquel Mohammed Aziz, et al vs. Donald Trump in his official capacity as United States President et al Civil Action No. 1:17-cv-116

35. Civil action No. 1:17-cv-480

36. Judicial Watch vs. Eric Holder

38. Judicial Watch vs. Covington, Burlington, Eric Holder

39. Case # 1:17-CV-00421 Judicial Watch vs. Department of Justice

40. Case # 1:17-CV-00414 Judicial Watch vs. Central Intelligence Agency

41. Klayman v. Obama 16-CV-80087(Lynch and/or Obama Gun Control).

42. 0:16-cvus-05078 US Committee and Oversight vs. Loretta Lynch in her official Capacity as United States Attorney General

43. State of Hawaii and Ismail Elshikh vs. Donald Trump in his official capacity CASE #17-00050dkw-ksC

D. Corporate Disclosure Statement

Appellants and/or Petitioners James Shannon Bridgewater and/or Sharon Bridgewater(and our companies Specialty Investment Group L.L.C., a Georgia Company, Specialty Global Investments Inc., a Nevada Corporation, and Bridgewater & Company Inc., a California Corporation, The Coalition for Empowerment(formerly Greater Lansing Helping Hands)a 501C-3 non-profit organization, a Michigan and/or Georgia non-profit corporation, B & B Building Maintenance INC. a Michigan Corporation) once duly licensed, organized and existing under the laws of the State of California, State of Michigan and/or the State of Georgia with principle offices located at 965 Mission Street, San Francisco, CA, in the city of San Francisco, CA, County of San Francisco, 133 W. Michigan Ave. in the city of Ypsilanti, Michigan, County of Washtenaw, and 470 North Clayton Street, Suite 204 and 206, in the City of Lawrenceville, GA, County of Gwinnett, were once in business, now dissolved and/or no longer in business due to the acts or omissions.

I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that the foregoing is true and correct.

Executed 6th day of June 2017 in Detroit, Michigan

Sharon Bridgewater –Pro Se Petitioner
18952 Dale Street
Detroit, MI 48219
313-471-8714
Sbridge11@yahoo.com

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GLOSSARY

"INA". The Immigration and Nationality Act NSA

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INTRODUCTION

International laws, and treaties, The United States Constitution is the Supreme law of the land, Trump Article II, Section 1, Clause 8 Article II of the Constitution in pertinent part "take care that the laws be faithfully executed," Donald Trump in his official capacity as President is not is not above the law. No man is this county is so high that he is above the law. No Officer of the law may set that law at defiance with impunity. All the Officers of the government, from the highest to the lowest, are creatures of the law and are bound to obey it. It is the only supreme over in our system of government, and every man who by accepting Office participates in its functions is only the more strongly bound to submit to that supremeanacy, and to observe the limitations which it imposes upon the exercise of the authority which it gives. Unites States v. lee, 106 U.S. 196, 220. Trump, et al cannot enforce "unconstitutional legislation."

JURISDICTIONAL STATEMENT

Donald Trump is a United States Citizen with his principle place of business at 1600 Pennsylvania Ave, Washington DC and is found, resides and/or conduct business in this District of Columbia. There is an complete diverse in federal citizenship, inasmuch as Sharon Bridgewater the Appellant is citizen of the State of Michigan, and the defendant Donald Trump, [his directors, subsidiaries, affiliates, agents, servants, employees, successors, attorneys, and assigns, and any other persons or entities under his control, and each of them, and all persons and entities in active concert of participation with Trump "executing and/or enforcing" Executive Order 13780, including but not limited to James B. Comey] are citizens of the states of Virginia and/or Maryland and/or Delaware. Appellant Sharon Bridgewater further allege that the amount in controversy exceeds $75,000.00, exclusive of costs, expenses, interests, and fees, for purposes of invoking and establishing federal diversity of citizenship subject matter jurisdiction under Title 28 United States Code §§ 1332(a)(1),(2), and 1332(b). This court further have jurisdiction pursuant to one or more 42 U.S.C. Sections 1983, 1985, 1986, 1988, the 5th, 9th, 10th, and/or 14th , 42 USC Section 2000 a-1,2 and/or 3, 42 USC Section 2000e and/or 42 USC section 2000e, 28 U.S.C. §§ 2201 and/or 2202 and 1253.

STATEMENT OF ISSUES

Whether Donald Trump executive Orders of March 6, 2017 violates the Plaintiff and those similarly situated one or more US Constitutional rights as defined in the 5th, " 9th, 10th, 14th Amendment US Constitutional rights and/or the Declaration of Human Rights. Whether the Plaintiff Sharon Bridgewater and those similarly situated were detained and/or continues to be detained by Donald Trump[et al]without due process of law, in violation of the United States Constitution; and/or James Shannon Bridgewater 4th and/or 5th and/or 14th US Constitutional rights were violated via the traffic ticket issued on 12/14/2016 and whether the notice date and/or mandate of James S. Bridgewater to appear in court on the Jan. 19, 2017 and/or Feb. 8, 2017 is "constitutional."

STANDARD OF REVIEW

This Court also reviews de novo administrative orders and/or Executive Orders of Donald Trump in his official capacity as President "his decisions and/or actions," and the Homeland Security, Protecting the Nations from Foreign Terrorist entry into the United States entered on Jan. 27, 2017 and entered on March 6, 2017 that are: (1) arbitrary, capricious, and/or is an abuse of discretion, or otherwise not in accordance with law and contrary to the United States Constitution. Constitutional right, power, privileges, or immunity; (2) taken in excess of statutory jurisdiction within this United States District Court of Columbia, traffic tickets issued without due process of law and mandates for James S. Bridgewater to appear in court on the Jan. 19, 2017 and/or Feb. 8, 2017 in violation of his US Constitutional civil rights, and further this court may de novo review Habeas Corpus Petitions.

STATEMENT OF FACTS

There is a controversy between James Shannon Bridgewater and/or Sharon Bridgewater and Donald Trump(and his predessors from Jan. 1, 1993), and Does Respondents and/or Defendants.

The Committee on Oversight and Government Reform, United States House of Representatives is a standing committee of the United States House of Representatives and they are citizens of the US Legislative Branch vested by the Constitution with the responsibility and authority to oversee Executive Branch agencies– to ensure, among other things;

1) that officials in charge of those agencies are held fully accountable to the American people.

2) Make imperative robust congressional oversight to protect the public interest.

3) To conduct oversight of financial management and to insure public money paid from the Treasury is appropriate and/or used for the purpose or purposes for which they were appropriated for.(It prohibits charging Page

4) Authorized items to the wrong appropriation, and unauthorized items to any appropriation, and expenditures must not be prohibit by law and/or must not be otherwise provided for, that is, it must not be an item that falls within the scope of some other appropriation or statutory funding scheme).

5) to ensure that appropriation out of the Treasury or to authorize in making a contract for the payment of money is used specifically what the appropriation is made for and/or pursuant to the contact made

6) investigate and review the malfeasance of the Judicial and Executive Branch by abuse of delegated authority of Congress

7) to investigation fraud, abuse, waste, and to investigate executive cabinet members

8) and/or have the powers of legislative branch, include the sole Power to try all Impeachments and Judgment in Cases of Impeachment extend to removal from Office, and/or disqualification to hold and the Party convicted shall be liable and subject to Indictment, Trial, Judgment and Punishment, according to Law.

9)The Power to apply to a judge or clerk of a court of the United States to issue a subpoena(as defined in USC Section 304) for a witness within the jurisdiction of the court to appear at a time and place stated in the subpoena before an individual authorized to take depositions to be used in the courts of the United States, to give full and true answers to such written interrogatories and cross-interrogatories as may be submitted with the application, or to be orally examined and cross-examined on the subject of the claim.

10)Re-Organize Executive Branches and; on or about August 13, 2012, commenced a criminal investigation; known as "OPERATION FAST AND FURIOUS." It concerned a breach of trust that left countless of innocent Mexican citizens and at least one Federal Border Patrol agent dead. In 2009, the ATF began allowing straw purchasers to walk guns into Mexico, believing that

This initiative would help them track the use of firearms by higher-ups within the Mexican drug cartels. Guns instead were being seized and allowed to cross the Mexican border without the knowledge of the Mexican Government. This effort failed.

June 20, 2012 - President Barack Obama asserts executive privilege over the documents sought by the investigating committee. This prevents future prosecution of Lynch. June 28, 2012 - The House of Representatives votes 255-67 to hold Lynch in criminal contempt. This is the first time in American history that the head of the Justice Department has been held in contempt by Congress. The rest of events can be found at website: http://rinosandrats.com/2011/09/the-gunwalker-scandal-overview-timeline/

For years, these documents have been at the center of a dispute between the Obama administration and congressional Republicans, who demanded the documents back in 2011 as part of the investigation into the case.

In addition to the above facts on or about November 2009 On or about November 2009 while Holder and/or those operating under his direction knowingly permitted firearms to be illegally purchased in the United States and unlawfully transferred to third-party possessors, Holder and his accomplices unlawfully removed Specialty Investment Group LLC, Specialty Global Investments INC. and/or the

Plaintiffs business and/or personal property from the Plaintiffs possession; accessed, delayed, transferred, and exploited that stolen property and caused injury to the Plaintiffs. Since that time the Plaintiff Sharon Bridgewater, Specialty Investment Group LLC et al, learn what precisely Holder et al has been done with property while it has been outside the Sharon Bridgewater's et al possession, custody and control. The information acquired by the Plaintiffs has been staggering. Eric Holder Jr. and his accomplices and various Attorney(s) – Officers of the court, and others came to the meeting of the mind, entered into an unlawful agreement, distributed the Plaintiffs property to whomever they could all while ignoring the Plaintiffs repeated demands to surrender to the Plaintiffs her personal and business possessions. Each one of these wrongdoers recognized they had no authority whatsoever to take any action with respect to the Plaintiffs property. In spite of this acknowledgment in conscious awareness and apparent disregard of their tortuous conduct Eric Holder and those operating under his direction; distributed Specialty Investment Group Property voluntarily offered it up to Georgia, and/or California and/or Michigan authorities in order to promote a criminal prosecution of the Plaintiff.

In furtherance of the above unlawful acts, on or about Jan. 20, 2017, Donald Trump adopted the acts of one or more Loretta Lynch, Eric Holder, Obama, et al acted

And/or refused to act and caused the Petitioner injury and/or damage and continues to damage the Petitioner/Plaintiffs/Appellants.

The President possess wide discretion in deciding how and even when to enforce laws. President Donald Trump was inaugurated on January 20, 2017, and before taking office he oath of office, palmed his hand on the Holy Bible and stated, “I, do solemnly swear (or affirm) that I will support and defend the Constitution of the United States against all enemies, foreign and domestic; that I will bear true faith and allegiance to the same; that I take this obligation freely, without any mental reservation or purpose of evasion; and that I will well and faithfully discharge the duties of the office on which “He” and added, "So help me God!" Article. II. - The Executive Branch Section 1.

Trump have legal duties and/or obligations to “take care that the laws be faithfully executed,” as defined in Article II, Section 1, Clause 8 Article II of the Constitution. Donald Trump "is found", "in possession" or "in charge" of the entire United Sates and the “State of Affairs” of the United States of America with legal duties and obligations and responsibilities as the United States President. Donald Trump is the Commander in-Chief of the armed forces etc. and a State Actor acting under the color of State and/or Federal law with legal duties and obligation to uphold the United States Constitution with Trump owed of care to Sharon Bridgewater and/or James S. Bridgewater. On or about January 20, 2017, and continuing thru present Trump et al and Bridgewater at all times mentioned had a continues to have a “fiduciary

Relationship-public official/citizen relationship." Trump at all times mentioned have legal duties and obligation to exercise discretion in creating laws that will impact the Plaintiff Bridgewater and/or other lives. Trump position as United States President is Superior to citizens of the United States as well as the Plaintiff Bridgewater. He at all times mentioned owe a duty of care to Sharon Bridgewater and/or James S. Bridgewater a duty of loyalty, a duty of impartiality, accountability and a duty to preserve the public's trust in the government. He is further subjected to regulation and/or laws under the United States Bill of Rights, Including the First, second, Fifth, sixth, seventh, eighth, ninth, tenth and Fourteenth Amendments and "all the amendments of the United States Constitution, and further is subjected to International treaties, the Declaration for human rights." Trump(and/or his predecessor Obama) is prohibited from enforcing issuing "unconstitutional executive orders," illegally detaining US Citizens without due process of law, and/or issuing executive orders not in accordance with law and contrary to the United States. On or about Jan. 1. 1997 and continuing thru present the Petitioner/Plaintiff Bridgewater and/or Donald Trump at all times mentioned were competitors. At all times mentions on or about Jan. 1, 1997 thru to his term, Trump founded the "The Trump Organization - from 1971 to 2017;" which consist of and/or is a privately owned international conglomerate based in Trump tower in Midtown

Manhattan, New York City, which comprises the business ventures and investments. The company owns, operates, invests, and develops residential real estate, hotels, resorts, residential towers, and golf course in America as well as different countries[globally], and with 515 subsidiaries and entities with 264 of them bearing Trumps name and another 54 including his initials. Donald Trump his was the chairman and President (until being elected in 2017) directly engaged in the production, distribution, or acquisition of services, money, goods, or other property in interstate and/or foreign *commerce*.

Donald Trump (The Trump Organization - from 1971 to 2017),) is a privately owned international conglomerate based in Trump tower in Midtown Manhattan, New York City, which comprises the business ventures and investments. The company owns, operates, invests, and develops residential real estate, hotels, resorts, residential towers, and golf course in America as well as different countries[globally], and with 515 subsidiaries and entities with 264 of them bearing Trumps name and another 54 including his initials. Donald Trump his was the chairman and President (until being elected in 2017) directly engaged in the production, distribution, or acquisition of services, money, goods, or other property in interstate and/or foreign *commerce*.

US CONSTITUTIONAL 4TH AND/OR 5TH AND/OR 14TH AMENDMENT VIOLATION

On January 27, 2017, Trump signed Executive Order No. 13769; he at all times is an employee of the United States Government and was at all times acting within the purpose and scope of such agency and employment. The January 27 Executive Order barred all admissions of individuals from seven Muslim-majority countries for an initial 90-day period; provided for the possibility of an indefinite extension of the ban on those countries; banned Syrian refugees indefinitely; banned all other refugees for 120 days; lowered the annual level of refugee admissions from 110,000 to 50,000; and created a mechanism to give preference to Christian refugees living in Muslim-majority countries. It discriminated against Muslims on the basis of religion and nationality, violating the Constitution and the Immigration and Nationality Act ("INA"). One or more of his directors, subsidiaries, affiliates, agents, servants, employees, successors, attorneys, and assigns, persons or entities under his control, and each of them, and all persons and entities in active concert of participation with him including but not limited to Rex Tillerson in his official capacity as the Secretary of State for the United States, Jeff Sessions in his official capacity as United States Attorney General, John Kelly in his official capacity as Director of Homeland

Security, Thomas E. Brandon in his official capacity as Acting Director of the United States Bureau of the Alcohol, Tobacco and FireArms and Explosives enforced and/or executed his executive order.

The January 27 Order created massive chaos and confusion in its short period of full operation. It placed people at risk of persecution and torture, separated families, disrupted workplaces, and interfered with courses of study; and led to spontaneous protests and demonstrations at airports throughout the United States by persons demanding that the detainees be allowed access to the many lawyers who had also gathered at the airports to provide pro bono legal assistance to the detainees and their relatives. (*E.g.*, *Protests Erupt at Airports Following Trump Travel Ban*, N.Y. Times (Jan. 29, 2017, 2:12 A.M.), https://goo.gl/pKOHoR; Elise Viebeck and Michael Laris, *Hundreds of lawyers descend on airports to offer free help after Trump's executive order*, The Washington Post (Jan. 29, 2017), https://goo.gl/AiGZJ3; Betsy Woodruff, *Trump's Border Patrol Defies Judge, U.S. Senator at Dulles Airport as His First Constitutional Crisis Unfolds*, The Daily Beast (Jan. 29, 2017, 8:44 a.m.), https://goo.gl/unbtlN).

On January 28, travelers from Yemen and sixty "John Doe" travelers who had arrived with valid credentials but had been detained by CBP at Dulles. It was immediately challenged in several courts, and was quickly enjoined in large part, most significantly by a nationwide injunction issued by the District Court for the Western District of Washington on February 3, 2017. *See Washington v. Trump,* No. C17–0141–JLR, 2017 WL 462040 (W.D. Wash. Feb. 3, 2017) (enjoining Sections 3(c), 5(a)-(c), and 5(e) of the January 27 Executive Order. On January 28, travelers from Yemen and sixty "John Doe" travelers with valid credentials were "illegally," detained by CBP at Dulles Airport.

On March 6, 2017, Trump signed an revised Order—Executive Order 13780 a little over a month later. This Executive Order was very similar to the 1st Order. It discriminates on the basis of religion and nationality, violating the Constitution and the Immigration and Nationality Act ("INA"). The government "may not adopt programs or practices . . . which . . . oppose any religion." *Larson v. Valente*, 456 U.S. 228, 246 (1982) (citation and punctuation omitted). "This prohibition is absolute." *Id.* Voluminous evidence—including public statements by the President and his close associates—demonstrates that the March 6 Order, both in purpose and effect, discriminates against Muslims and their religion, Islam. It also violates the clear statutory prohibition on nationality-based discrimination by the executive branch.

Moreover, the Executive Order causes severe and irreparable injury to the individual and/or the Appellant, the organizational plaintiffs, and the organizational plaintiffs' clients, separating family members from one another, stranding people in unsafe locations overseas, and stigmatizing and demeaning one religious group. The government's own actions demonstrate that there is no legitimate justification for this discriminatory Order.

On or about March 24, 2017 US District Court Judge Anthony Trenga ruled in favor of Trumps revised Executive Order.

On or about Jan. 28, 2017 and continuing thru present multiple states filed lawsuits against Donald Trump; the Appellant shows as follows:

More States Challenge Trump's Immigration Order in Court | Fortune ...

*fortune.com/2017/02/01/trump-**immigration-order-states**-legal-challenge/*Jan 31, 2017 **...** San Francisco became the first U.S. city to **sue** to challenge a Trump directive to
withhold ... For more on the **immigration** executive **order**, watch: ...

6 US States Challenge Trump's Revised Travel Ban - VOA News

www.voanews.com/a/3757550.html

Mar 9, 2017 **...** The president's new **immigration order** is "narrower" than the original version ...

Chin's office **filed** an amended **lawsuit** against President Donald ...

Challenges to Trump's immigration orders spread to more US states

*www.reuters.com/.../us-usa-trump-**immigration**-sanfrancisco- idUSKBN15F2B1*

Feb 1, 2017 **...** Challenges to Trump's **immigration orders** spread to more U.S. **states** ... San
Francisco became the first U.S. city to **sue** to challenge a Trump ...

Four states sue Trump administration over 'un-American' travel ban ...

*https://www.theguardian.com/us.../trump-travel-ban-**state-lawsuits***

Feb 1, 2017 **...** Four **states sue** Trump administration over 'un-American' travel ban ... **states** and
beyond at the weekend as people with valid **immigration** ... On Tuesday New York joined a federal **lawsuit** against Trump's executive **order** ...

50-plus lawsuits filed against Trump refugee order | TheHill

*thehill.com/.../**state**.../317822-50-pus-**lawsuits-filed**-against-trump-refugee- **order***

Feb 3, 2017 **...** The **lawsuits**, **filed** across U.S. district courts in 14 **states**, run the ... **filed** in Virginia, alleges the **order** amounts to a ban on Muslim **immigration**, ...

16 States File Support for Lawsuits Against Trump's Immigration Ban

*www.governing.com/.../tns-oregon-trump-amicus-**immigration**.html*

Feb 7, 2017 **...** 16 **States File** Support for **Lawsuits** Against Trump's **Immigration** Ban ... their
federal **lawsuit** against the Trump Administration's executive **order** ...

Washington is first state to sue Trump over immigration order ...

*www.chicagotribune.com/.../ct-washington-**state-lawsuit**-trump-travel-ban-20170130-story.html*

Jan 30, 2017 **...** Washington **state's** attorney general says he is suing President Donald Trump
over an executive **order** that suspended **immigration** from seven ...

Hawaii to File Legal Challenge Over New Trump Immigration Order ...

*www.nbcnews.com/.../hawaii-**file**-legal-challenge-over-new-trump-travel- **order**-n730426*

Mar 8, 2017 **...** Hawaii first to **sue** over new Trump travel ban 5:17 ... by a federal judge in Seattle
after the **state** of Washington challenged the **immigration** ban.

17 states back Washington and Minnesota in Trump immigration ...

*https://www.geekwire.com/.../17-**states**-back-washington-minnesota-trump-**immigration-lawsuit**/*

Feb 6, 2017 **...** Seventeen **states** — in addition to Washington and Minnesota — are ask. ...
Order (TRO), which brought Trump's travel and **immigration** ban to a ...
Washington was the first **state** to **sue** the Trump Administration over the **order** ...

Biggest Lawsuit Yet Filed Against Donald Trump's Immigration Order

*www.thedailybeast.com/.../biggest-**lawsuit**-yet-**filed**-against-donald-trump-s-**immigration-order***

Jan 30, 2017 **...** Biggest **Lawsuit** Yet **Filed** Against Donald Trump's **Immigration Order** ... the
United **States**, pursuant to the Muslim Exclusion **Order**, based solely ...

THE CONTROVERSY BETWEEN TRUMP AND SHARON AND/OR JAMES SHANNON BRIDGEWATER

Donald Trump contends he can enforce arbirartaory and cap amd has discriminated against the Plaintiff based on race, class, gender, illegally detained US Citizen The Appellant Bridgewater has a legally protectable stake and/or interest and has a dispute that entitles her to bring this controversy before the court. The controversy that exist between Donald Trump in his official capacity et al and the Appellant Sharon Bridgewater.

ARGUMENT

THE UNITED STATES CONSTITUTION IS THE SUPREME LAW OF THE LAND

The United States Constitution and/or International treaties is the "supreme law" of the land." One or more Article I, Section 1, Article I, Section 9, Clause 3 or Article IV, Section 1 and 42 USC section 1983 and/or 42 USC section 1985 provides for "any person who is denied and/or deprived equal protection under the laws and/or is injured in business, person and/or property may sue. Illegal for the United States

Government and/or Trump to discriminate against the Appellant Bridgewater and others similarly situated, act under the color of law and deny and/or deprive the Appellant and those similarly situated their rights as guaranteed and/or as defined in the United States Constitution and/or interfere with the Appellants human rights as defined in the Universal Declaration of Human Rights and/or International Covenant on Civil and Political Rights. The federal government may not interfere with "the 50 States," rights and/or interfere and/or violate the Appellants US Constitutional rights. The 9TH AMENDMENT and/or the 10th Amendment in pertinent part states:

"The powers not delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States respectively, or to the people." The Constitution delegated few, enumerated powers to the Federal Government, reserving all remaining powers to the States and the people. and States are Sovereign. "Each state retains its sovereignty, freedom, and independence, and every power, jurisdiction, and right, which is not by this Confederation expressly delegated to the United States, in Congress assembled." The Tenth Amendment assures that we, the people of the United States of America and each sovereign state in the Union of States, now have, and have always had, rights the federal government may not usurp. Article IV, Section 4 says, "The United States shall guarantee to Every state in this Union a republican form of government.....", and the Ninth Amendment states that..."The enumeration in the Constitution, of certain rights, shall not be construed to deny or disparage others retained by the people."

The fifth amendment in pertinent part states:

"No person shall be held to answer for a capital, or otherwise infamous crimes, unless on a presentment or indictment of a grand jury except in cases arising in the land or naval forces, or in the militia, when in actual service in time or war or public danger; nor shall any person be subject for the same offense to be twice put in jeopardy or life or limb; nor shall be compelled in any criminal case to be a witness against himself, nor deprived of life, liberty, property, without due process of law; not shall private property be taken for public use without compensation. The law singles out those of Muslim faith and/or the Plaintiff amounts to an establishment of a state religion in violation of the first amendment of the Constitution (congress shall make no laws respecting establishment of religion). Trump order- provides for religious minorities evidence of discriminatory intent – even though the order did not mention Muslims or Christians by name. Trump order violates the 5th and/or 14^{th} amendment of due process of law by denying entry to individual who had a valid visas. The very unknot of due process emerged from a desire to limit the king ability to order unlawful arrest. The US Government and/or Donald Trump is prohibited the Government from discriminating against the Appellant and/or those similarly situated based on religion, race, class and/or gender. In case entity, when a public official knowingly, intentionally act under the color of law and deny and/or deprive a person of equal protection of the laws, it permits that individual to sue for damages. Trump is prohibited from interfering with the States rights, and/or violating my US Constitutional rights and from enforcing discriminatory laws and/or issuing discriminatory executive orders. An actual controversy has arisen and now exists between Sharon and James Bridgewater and Donald Trump, concerning their respective rights and duties in that Appellee Donald Trump et al contends that one or more can obstruct a congressional investigation, discriminate against the Appellant based on race, class, gender, sex, disability and/or religion, deny and/or deprive the Appellant equal protection of the laws under the US Constitution and violate court orders, engage in a pattern of Rackeeteering Activity, retrain interstate and foreign commerce, hold the Appellant to a condition of peonage and/or slavery, commit overt acts such as human rights violations, torture and war crimes enforce arbitrary, capricious laws, abuse their discretion, enforce laws not in accordance with law and contrary to the United States Constitution, make and/or take acts in excess of statutory jurisdiction, breach contracts, breach fid duties, and not be held accountable , whereas Appellant disputes these contentions and contends that she is entitled to "full and complete relief via an admiralty and/or maritime claims" and is entitled to immediate declaratory and injunctive relief and the Appointment of a Special Prosecutor.

CONTITUTING CONSPIRACY OF CIVIL RIGHTS VIOLATIONS AND

On January 27, 2017 and/or March 6, 2017 Trump signed Executive Order No. 13769; he at all times is an employee of the United States Government and was at all times acting within the purpose and scope of such agency and employment. The January 27 and/or March 6, 2017 Executive Order(the order an nearly identical) barred all admissions of individuals from seven Muslim-majority countries for an initial 90-day period; provided for the possibility of an indefinite extension of the ban on those countries; banned Syrian refugees indefinitely; banned all other refugees for 120 days; lowered the annual level of refugee admissions from 110,000 to 50,000; and created a mechanism to give preference to Christian refugees living in Muslim-majority countries. It discriminated against Muslims on the basis of religion and nationality, violating the Constitution and the Immigration and Nationality Act ("INA"). One or more of his directors, subsidiaries, affiliates, agents, servants, employees, successors, attorneys, and assigns, persons or entities under his control, and each of them, and all persons and entities in active concert of participation with him including but not limited to Rex Tillerson in his official capacity as the Secretary of State for the United States, Jeff Sessions in his official capacity as United States Attorney General, John Kelly in his official capacity as Director of Homeland Security, Thomas E. Brandon in his official capacity as Acting Director of the United States Bureau of the Alcohol, Tobacco and FireArms and Explosives enforced and/or executed his executive order. Comes now the Appellant Sharon Bridgewater for the following:

Phase I: immediate preliminary injunctions;

Phase II: declaratory Judgment

Phase III: all other lawful relief which this Court deems just and proper, including but not limited to, permanent injunctions against certain named parties Donald Trump, and/or James B. Comey, his directors, subsidiaries, affiliates, agents, servants, employees, successors, attorneys, and assigns, and any other persons or entities under his control, and each of them, and all persons and entities in active concert of participation with Trump via the Executive Order 13780. An actual controversy has arisen and now exists between Appellant Sharon Bridgewater and Appellees Donald Trump, Sessions, James Comey, et al an actual controversy exist between Donald Trump and/or the Appellant concerning their respective rights and duties in that Appellee Donald Trump et al contends that he can discriminate against the Appellant based on race, class, gender, sex, disability and/or religion, deny and/or deprive the Appellant equal protection of the laws under the US Constitution enforce arbitrary, capricious laws, enforce laws not in accordance with law and contrary to the United States Constitution, and/or violate the "50 States and/or the Appellants" ninth and/or tenth US Constitutional right whereas Appellant disputes these contentions and contends that Donald Immigration and Nationality Act ("INA")is discriminatory and/or unconstitutional and the Appellant Sharon Bridgewater is illegal detained in violation of international laws and/or treaties and/or in violation of the United States Constitution and is entitled to a temporary restraining enjoining Executive Order 13780, in its entirety.

a. it is contrary to law;

b. it is an abuse of discretion;

c. the decision is against the manifest weight of the evidence

The Appellant Sharon Bridgewater is further entitled to immediate injunctive relief for damages sustained by Trump et al acts or omissions. A declaration that Donald Trump Executive Order 13780 is unconstitutional and discriminatory and violates the Appellant 5th and/or 9th and/or 10th US Constitutional Civil rights. A judicial declaration is necessary and appropriate at this time under the circumstances. The Appellant has exhausted all available remedies and has no other adequate remedies at law without this court intervention and immediate declaratory and injunctive relief pursuant to Fed. R. Civ. P. 65.

Remedy Requested

1. That this court issue a Writ of Certiorari in this cause requiring Appellee to file The record of all matters relating to this decision with the Court.

2. Declare that the Adminstrative Agency Action and/or Donald Trump's action of March 6, 2017 are nearly identical to the Jan. 27, 2017, unconstitutional and discriminatory.

3. Declare that the Administrative Agency Action and/or Donald Trump's action of March 6, 2017as mentioned in the above infringes on one or more of the Appellant 9th and/or 10th US Constitutional rights.

4. That the Court review the decision of the Donald Trump that and that the final administrative decisions be reversed.

5. That the Court issue an emergency stay of enforcement of the decision pending review on the merits in this cause and pending the final disposition of the case.

6. Declare that the District Court of Columbia made an error in dismissing the Appellant Complaint and denying the Appellant a temporary restraining order, and reverse the District Court Decision.

7. Declare that Trump Executive Order violates the "50 States" and/or the Appellant 9th and/or tenth amendment US Constitutional rights.

8. Declare that the Appellant Sharon Bridgewater has (1) a substantial likelihood of success on the merits; (2) will suffer irreparable injury; (3) the injury to Plaintiffs injunction would not harm the public interest, and the Plaintiff is not required to post bond.

9.That Plaintiff have such other and further relief as deemed l be proper and that this Court.

I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that the foregoing is true and correct.

Executed 5th day of JMay 2017 in Detroit, Michigan

Sharon Bridgewater –Pro Se
Petitioner
18952 Dale Street
Detroit, MI 48219
313-471-8714
Sbridge11@yahoo.com

VERIFICATION

I Sharon Bridgewater being duly sworn

And disposes and says I have read this COMPLAINT FOR COMMON LAW WRIT OF CERTIORARI and know the contents thereof and the same is true to the best of my knowledge, except as to the matters therein stated to be on information and belief, and as to those matters I believe it to be true.

I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that the foregoing is true and correct.

Executed 5th day of May 2017 in Detroit, Michigan

Sharon Bridgewater –Pro Se
Petitioner
18952 Dale Street
Detroit, MI 48219
313-471-8714
Sbridge11@yahoo.com

Conclusions

This Court should declare that Trump Order it discriminatory and issue a temporary restraining order, preliminary injunction and/or permanent injunction.

Respectfully submitted,

Sharon Bridgewater –Pro Se
Appellant
18952 Dale Street
Detroit, MI 48219
313-471-8714
Sbridge11@yahoo.com

Date: May 5th, 2017.

ADDENDUM

Executive 13780 ....A1

Order Granting Motion to convert TRO to preliminary injunction.............A2

TRO...A3

White House

Office of the Press Secretary

For Immediate Release

January 27, 2017

EXECUTIVE ORDER: PROTECTING THE NATION FROM FOREIGN TERRORIST ENTRY INTO THE UNITED STATES

EXECUTIVE ORDER

- - - - - - -

Protecting the Nation from Foreign Terrorist Entry into the United States

By the authority vested in me as President by the Constitution and laws of the United States of America, including the Immigration and Nationality Act (INA), 8 U.S.C. 1101 *et seq*., and section 301 of title 3, United States Code, and to protect the American people from terrorist attacks by foreign nationals admitted to the United States, it is hereby ordered as follows:

Section 1. Purpose. The visa-issuance process plays a crucial role in detecting individuals with terrorist ties and stopping them from entering the United States. Perhaps in no instance was that more apparent than the terrorist attacks of September 11, 2001, when State Department policy prevented consular officers from properly scrutinizing the visa applications of several of the 19 foreign nationals who went on to murder nearly 3,000 Americans. And while the visa-issuance process was reviewed and amended after the September 11 attacks to better detect would-be terrorists from receiving visas, these measures did not stop attacks by foreign nationals who were admitted to the United States.

Numerous foreign-born individuals have been convicted or implicated in terrorism-related crimes since September 11, 2001, including foreign nationals who entered the United States after receiving visitor, student, or employment visas, or who entered through the United States refugee resettlement program. Deteriorating conditions in certain countries due to war, strife, disaster, and civil unrest increase the likelihood that terrorists will use any means possible to enter the United States. The United States must be vigilant during the visa-issuance process to ensure that those approved for admission do not intend to harm Americans and that they have no ties to terrorism.

In order to protect Americans, the United States must ensure that those admitted to this country do not bear hostile attitudes toward it and its founding principles. The United States cannot, and should not, admit those who do not support the Constitution, or those who would place violent ideologies over American law. In addition, the United States should not admit those who engage in acts of bigotry or hatred (including "honor" killings, other forms of violence against women,

A1

or the persecution of those who practice religions different from their own) or those who would oppress Americans of any race, gender, or sexual orientation.

Sec. 2. Policy. It is the policy of the United States to protect its citizens from foreign nationals who intend to commit terrorist attacks in the United States; and to prevent the admission of foreign nationals who intend to exploit United States immigration laws for malevolent purposes.

Sec. 3. Suspension of Issuance of Visas and Other Immigration Benefits to Nationals of Countries of Particular Concern. (a) The Secretary of Homeland Security, in consultation with the Secretary of State and the Director of National Intelligence, shall immediately conduct a review to determine the information needed from any country to adjudicate any visa, admission, or other benefit under the INA (adjudications) in order to determine that the individual seeking the benefit is who the individual claims to be and is not a security or public-safety threat.

(b) The Secretary of Homeland Security, in consultation with the Secretary of State and the Director of National Intelligence, shall submit to the President a report on the results of the review described in subsection (a) of this section, including the Secretary of Homeland Security's determination of the information needed for adjudications and a list of countries that do not provide adequate information, within 30 days of the date of this order. The Secretary of Homeland Security shall provide a copy of the report to the Secretary of State and the Director of National Intelligence.

(c) To temporarily reduce investigative burdens on relevant agencies during the review period described in subsection (a) of this section, to ensure the proper review and maximum utilization of available resources for the screening of foreign nationals, and to ensure that adequate standards are established to prevent infiltration by foreign terrorists or criminals, pursuant to section 212(f) of the INA, 8 U.S.C. 1182(f), I hereby proclaim that the immigrant and nonimmigrant entry into the United States of aliens from countries referred to in section 217(a)(12) of the INA, 8 U.S.C. 1187(a)(12), would be detrimental to the interests of the United States, and I hereby suspend entry into the United States, as immigrants and nonimmigrants, of such persons for 90 days from the date of this order (excluding those foreign nationals traveling on diplomatic visas, North Atlantic Treaty Organization visas, C-2 visas for travel to the United Nations, and G-1, G-2, G-3, and G-4 visas).

(d) Immediately upon receipt of the report described in subsection (b) of this section regarding the information needed for adjudications, the Secretary of State shall request all foreign governments that do not supply such information to start providing such information regarding their nationals within 60 days of notification.

(e) After the 60-day period described in subsection (d) of this section expires, the Secretary of Homeland Security, in consultation with the Secretary of State, shall submit to the President a list of countries recommended for inclusion on a Presidential proclamation that would prohibit the entry of foreign nationals (excluding those foreign nationals traveling on diplomatic visas, North Atlantic Treaty Organization visas, C-2 visas for travel to the United Nations, and G-1, G-2, G-3, and G-4 visas) from countries that do not provide the information requested pursuant to subsection (d) of this section until compliance occurs.

(f) At any point after submitting the list described in subsection (e) of this section, the Secretary of State or the Secretary of Homeland Security may submit to the President the names of any additional countries recommended for similar treatment.

(g) Notwithstanding a suspension pursuant to subsection (c) of this section or pursuant to a Presidential proclamation described in subsection (e) of this section, the Secretaries of State and Homeland Security may, on a case-by-case basis, and when in the national interest, issue visas or other immigration benefits to nationals of countries for which visas and benefits are otherwise blocked.

(h) The Secretaries of State and Homeland Security shall submit to the President a joint report on the progress in implementing this order within 30 days of the date of this order, a second report within 60 days of the date of this order, a third report within 90 days of the date of this order, and a fourth report within 120 days of the date of this order.

Sec. 4. Implementing Uniform Screening Standards for All Immigration Programs. (a) The Secretary of State, the Secretary of Homeland Security, the Director of National Intelligence, and the Director of the Federal Bureau of Investigation shall implement a program, as part of the adjudication process for immigration benefits, to identify individuals seeking to enter the United States on a fraudulent basis with the intent to cause harm, or who are at risk of causing harm subsequent to their admission. This program will include the development of a uniform screening standard and procedure, such as in-person interviews; a database of identity documents proffered by applicants to ensure that duplicate documents are not used by multiple applicants; amended application forms that include questions aimed at identifying fraudulent answers and malicious intent; a mechanism to ensure that the applicant is who the applicant claims to be; a process to evaluate the applicant's likelihood of becoming a positively contributing member of society and the applicant's ability to make contributions to the national interest; and a mechanism to assess whether or not the applicant has the intent to commit criminal or terrorist acts after entering the United States.

(b) The Secretary of Homeland Security, in conjunction with the Secretary of State, the Director of National Intelligence, and the Director of the Federal Bureau of Investigation, shall submit to the President an initial report on the progress of this directive within 60 days of the date of this order, a second report within 100 days of the date of this order, and a third report within 200 days of the date of this order.

Sec. 5. Realignment of the U.S. Refugee Admissions Program for Fiscal Year 2017. (a) The Secretary of State shall suspend the U.S. Refugee Admissions Program (USRAP) for 120 days. During the 120-day period, the Secretary of State, in conjunction with the Secretary of Homeland Security and in consultation with the Director of National Intelligence, shall review the USRAP application and adjudication process to determine what additional procedures should be taken to ensure that those approved for refugee admission do not pose a threat to the security and welfare of the United States, and shall implement such additional procedures. Refugee applicants who are already in the USRAP process may be admitted upon the initiation and completion of these revised procedures. Upon the date that is 120 days after the date of this order, the Secretary of State shall resume USRAP admissions only for nationals of countries for which the Secretary of State, the Secretary of Homeland Security, and the Director of National Intelligence have jointly determined that such additional procedures are adequate to ensure the security and welfare of the United States.

(b) Upon the resumption of USRAP admissions, the Secretary of State, in consultation with the Secretary of Homeland Security, is further directed to make changes, to the extent permitted by law, to prioritize refugee claims made by individuals on the basis of religious-based persecution, provided that the religion of the individual is a minority religion in the individual's country of nationality. Where necessary and appropriate, the Secretaries of State and Homeland Security shall recommend legislation to the President that would assist with such prioritization.

(c) Pursuant to section 212(f) of the INA, 8 U.S.C. 1182(f), I hereby proclaim that the entry of nationals of Syria as refugees is detrimental to the interests of the United States and thus suspend any such entry until such time as I have determined that sufficient changes have been made to the USRAP to ensure that admission of Syrian refugees is consistent with the national interest.

(d) Pursuant to section 212(f) of the INA, 8 U.S.C. 1182(f), I hereby proclaim that the entry of more than 50,000 refugees in fiscal year 2017 would be detrimental to the interests of the United States, and thus suspend any such entry until such time as I determine that additional admissions would be in the national interest.

(e) Notwithstanding the temporary suspension imposed pursuant to subsection (a) of this section, the Secretaries of State and Homeland Security may jointly determine to admit individuals to the United States as refugees on a case-by-case basis, in their discretion, but only so long as they determine that the admission of such individuals as refugees is in the national interest -- including when the person is a religious minority in his country of nationality facing religious persecution, when admitting the person would enable the United States to conform its conduct to a preexisting international agreement, or when the person is already in transit and denying admission would cause undue hardship -- and it would not pose a risk to the security or welfare of the United States.

(f) The Secretary of State shall submit to the President an initial report on the progress of the directive in subsection (b) of this section regarding prioritization of claims made by individuals on the basis of religious-based persecution within 100 days of the date of this order and shall submit a second report within 200 days of the date of this order.

(g) It is the policy of the executive branch that, to the extent permitted by law and as practicable, State and local jurisdictions be granted a role in the process of determining the placement or settlement in their jurisdictions of aliens eligible to be admitted to the United States as refugees. To that end, the Secretary of Homeland Security shall examine existing law to determine the extent to which, consistent with applicable law, State and local jurisdictions may have greater involvement in the process of determining the placement or resettlement of refugees in their jurisdictions, and shall devise a proposal to lawfully promote such involvement.

Sec. 6. Rescission of Exercise of Authority Relating to the Terrorism Grounds of Inadmissibility. The Secretaries of State and Homeland Security shall, in consultation with the Attorney General, consider rescinding the exercises of authority in section 212 of the INA, 8 U.S.C. 1182, relating to the terrorism grounds of inadmissibility, as well as any related implementing memoranda.

Sec. 7. Expedited Completion of the Biometric Entry-Exit Tracking System. (a) The Secretary of Homeland Security shall expedite the completion and implementation of a biometric entry-exit tracking system for all travelers to the United States, as recommended by the National

Commission on Terrorist Attacks Upon the United States.

(b) The Secretary of Homeland Security shall submit to the President periodic reports on the progress of the directive contained in subsection (a) of this section. The initial report shall be submitted within 100 days of the date of this order, a second report shall be submitted within 200 days of the date of this order, and a third report shall be submitted within 365 days of the date of this order. Further, the Secretary shall submit a report every 180 days thereafter until the system is fully deployed and operational.

Sec. 8. Visa Interview Security. (a) The Secretary of State shall immediately suspend the Visa Interview Waiver Program and ensure compliance with section 222 of the INA, 8 U.S.C. 1202, which requires that all individuals seeking a nonimmigrant visa undergo an in-person interview, subject to specific statutory exceptions.

(b) To the extent permitted by law and subject to the availability of appropriations, the Secretary of State shall immediately expand the Consular Fellows Program, including by substantially increasing the number of Fellows, lengthening or making permanent the period of service, and making language training at the Foreign Service Institute available to Fellows for assignment to posts outside of their area of core linguistic ability, to ensure that non-immigrant visa-interview wait times are not unduly affected.

Sec. 9. Visa Validity Reciprocity. The Secretary of State shall review all nonimmigrant visa reciprocity agreements to ensure that they are, with respect to each visa classification, truly reciprocal insofar as practicable with respect to validity period and fees, as required by sections 221(c) and 281 of the INA, 8 U.S.C. 1201(c) and 1351, and other treatment. If a country does not treat United States nationals seeking nonimmigrant visas in a reciprocal manner, the Secretary of State shall adjust the visa validity period, fee schedule, or other treatment to match the treatment of United States nationals by the foreign country, to the extent practicable.

Sec. 10. Transparency and Data Collection. (a) To be more transparent with the American people, and to more effectively implement policies and practices that serve the national interest, the Secretary of Homeland Security, in consultation with the Attorney General, shall, consistent with applicable law and national security, collect and make publicly available within 180 days, and every 180 days thereafter:

(i) information regarding the number of foreign nationals in the United States who have been charged with terrorism-related offenses while in the United States; convicted of terrorism-related offenses while in the United States; or removed from the United States based on terrorism-related activity, affiliation, or material support to a terrorism-related organization, or any other national security reasons since the date of this order or the last reporting period, whichever is later;

(ii) information regarding the number of foreign nationals in the United States who have been radicalized after entry into the United States and engaged in terrorism-related acts, or who have provided material support to terrorism-related organizations in countries that pose a threat to the United States, since the date of this order or the last reporting period, whichever is later; and

(iii) information regarding the number and types of acts of gender-based violence against women, including honor killings, in the United States by foreign nationals, since the date of this order or the last reporting period, whichever is later; and

(iv) any other information relevant to public safety and security as determined by the Secretary of Homeland Security and the Attorney General, including information on the immigration status of foreign nationals charged with major offenses.

(b) The Secretary of State shall, within one year of the date of this order, provide a report on the estimated long-term costs of the USRAP at the Federal, State, and local levels.

Sec. 11. General Provisions. (a) Nothing in this order shall be construed to impair or otherwise affect:

(i) the authority granted by law to an executive department or agency, or the head thereof; or

(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

DONALD J. TRUMP

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAI‘I

STATE OF HAWAI‘I and ISMAIL ELSHIKH, Plaintiffs, vs. DONALD J. TRUMP, *et al.*, Defendants.	CV. NO. 17-00050 DKW-KSC **ORDER GRANTING MOTION TO CONVERT TEMPORARY RESTRAINING ORDER TO A PRELIMINARY INJUNCTION**

INTRODUCTION

On March 15, 2017, the Court temporarily enjoined Sections 2 and 6 of Executive Order No. 13,780, entitled, “Protecting the Nation from Foreign Terrorist Entry into the United States,” 82 Fed. Reg. 13209 (Mar. 6, 2017). *See* Order Granting Mot. for TRO, ECF No. 219 [hereinafter TRO]. Plaintiffs State of Hawai‘i and Ismail Elshikh, Ph.D., now move to convert the TRO to a preliminary injunction. *See* Pls.’ Mot. to Convert TRO to Prelim. Inj., ECF No. 238 [hereinafter Motion].

Upon consideration of the parties’ submissions, and following a hearing on March 29, 2017, the Court concludes that, on the record before it, Plaintiffs have met

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their burden of establishing a strong likelihood of success on the merits of their Establishment Clause claim, that irreparable injury is likely if the requested relief is not issued, and that the balance of the equities and public interest counsel in favor of granting the requested relief. Accordingly, Plaintiffs' Motion (ECF No. 238) is GRANTED.

BACKGROUND

The Court briefly recounts the factual and procedural background relevant to Plaintiffs' Motion. A fuller recitation of the facts is set forth in the Court's TRO. *See* TRO 3–14, ECF No. 219.

I. The President's Executive Orders

A. Executive Order No. 13,769

On January 27, 2017, the President of the United States issued Executive Order No. 13,769 entitled, "Protecting the Nation from Foreign Terrorist Entry into the United States," 82 Fed. Reg. 8977 (Jan. 27, 2017).[1] On March 6, 2017, the

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[1]On February 3, 2017, the State filed its complaint and an initial motion for TRO, which sought to enjoin Sections 3(c), 5(a)–(c), and 5(e) of Executive Order No. 13,769. Pls.' Mot. for TRO, Feb. 3, 2017, ECF No. 2. The Court stayed the case (*see* ECF Nos. 27 & 32) after the United States District Court for the Western District of Washington entered a nationwide preliminary injunction enjoining the Government from enforcing the same provisions of Executive Order No. 13,769 targeted by the State. *See Washington v. Trump*, No. C17-0141JLR, 2017 WL 462040 (W.D. Wash. Feb. 3, 2017). On February 4, 2017, the Government filed an emergency motion in the United States Court of Appeals for the Ninth Circuit seeking a stay of the *Washington* TRO, pending appeal. That emergency motion was denied on February 9, 2017. *See Washington v. Trump*, 847 F.3d 1151 (9th Cir.) (per curium), *denying reconsideration en banc*, --- F.3d ---, 2017

President issued another Executive Order, No. 13,780, identically entitled, "Protecting the Nation from Foreign Terrorist Entry into the United States" (the "Executive Order"), 82 Fed. Reg. 13209. Like its predecessor, the Executive Order restricts the entry of foreign nationals from specified countries and suspends the United States refugee program for specified periods of time.

B. Executive Order No. 13,780

Section 1 of the Executive Order declares that its purpose is to "protect [United States] citizens from terrorist attacks, including those committed by foreign nationals." By its terms, the Executive Order also represents a response to the Ninth Circuit's per curiam decision in *Washington v. Trump*, 847 F.3d 1151. According to the Government, it "clarifies and narrows the scope of Executive action regarding immigration, extinguishes the need for emergent consideration, and eliminates the potential constitutional concerns identified by the Ninth Circuit." Notice of Filing of Executive Order 4–5, ECF No. 56.

Section 2 suspends from "entry into the United States" for a period of 90 days, certain nationals of six countries referred to in Section 217(a)(12) of the Immigration and Nationality Act, 8 U.S.C. § 1101 *et seq*.: Iran, Libya, Somalia,

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WL 992527 (9th Cir. 2017). On March 8, 2017, the Ninth Circuit granted the Government's unopposed motion to voluntarily dismiss the appeal. *See* Order, Case No. 17-35105 (9th Cir. Mar. 8, 2017), ECF No. 187.

Sudan, Syria, and Yemen. 8 U.S.C. § 1187(a)(12); Exec. Order § 2(c). The suspension of entry applies to nationals of these six countries who (1) are outside the United States on the new Executive Order's effective date of March 16, 2017; (2) do not have a valid visa on that date; and (3) did not have a valid visa as of 5:00 p.m. Eastern Standard Time on January 27, 2017 (the date of Executive Order No. 13,769). Exec. Order § 3(a). The 90-day suspension does not apply to: (1) lawful permanent residents; (2) any foreign national admitted to or paroled into the United States on or after the Executive Order's effective date (March 16, 2017); (3) any individual who has a document other than a visa, valid on the effective date of the Executive Order or issued anytime thereafter, that permits travel to the United States, such as an advance parole document; (4) any dual national traveling on a passport not issued by one of the six listed countries; (5) any foreign national traveling on a diplomatic-type or other specified visa; and (6) any foreign national who has been granted asylum, any refugee already admitted to the United States, or any individual granted withholding of removal, advance parole, or protection under the Convention Against Torture. *See* Exec. Order § 3(b). Under Section 3(c)'s waiver provision, foreign nationals of the six countries who are subject to the suspension of entry may nonetheless seek entry on a case-by-case basis.

Section 6 of the Executive Order suspends the U.S. Refugee Admissions Program for 120 days. The suspension applies both to travel into the United States and to decisions on applications for refugee status. *See* Exec. Order § 6(a). It excludes refugee applicants who were formally scheduled for transit by the Department of State before the March 16, 2017 effective date. Like the 90-day suspension, the 120-day suspension includes a waiver provision that allows the Secretaries of State and Homeland Security to admit refugee applicants on a case-by-case basis. *See* Exec. Order § 6(c). Unlike Executive Order No. 13,769, the new Executive Order does not expressly refer to an individual's status as a "religious minority" or refer to any particular religion, and it does not include a Syria-specific ban on refugees.

II. Plaintiffs' Claims

Plaintiffs filed a Second Amended Complaint for Declaratory and Injunctive Relief ("SAC") on March 8, 2017 (ECF No. 64) simultaneous with their Motion for TRO (ECF No. 65). The State asserts that the Executive Order inflicts constitutional and statutory injuries upon its residents, employers, and educational institutions, while Dr. Elshikh alleges injuries on behalf of himself, his family, and members of his Mosque. SAC ¶ 1.

According to Plaintiffs, the Executive Order results in "their having to live in a country and in a State where there is the perception that the Government has established a disfavored religion." SAC ¶ 5. Plaintiffs assert that by singling out nationals from the six predominantly Muslim countries, the Executive Order causes harm by stigmatizing not only immigrants and refugees, but also Muslim citizens of the United States. Plaintiffs point to public statements by the President and his advisors regarding the implementation of a "Muslim ban," which Plaintiffs contend is the tacit and illegitimate motivation underlying the Executive Order. *See* SAC ¶¶ 35–60. Plaintiffs argue that, in light of these and similar statements "where the President himself has repeatedly and publicly espoused an improper motive for his actions, the President's action must be invalidated." Pls.' Mem. in Supp. of Mot. for TRO 2, ECF No. 65-1. Plaintiffs additionally present evidence that they contend undermines the purported national security rationale for the Executive Order and demonstrates the Administration's pretextual justification for the Executive Order. *E.g.*, SAC ¶ 61 (citing Draft DHS Report, SAC, Ex. 10, ECF No. 64-10).

III. March 15, 2017 TRO

The Court's nationwide TRO (ECF No. 219) temporarily enjoined Sections 2 and 6 of the Executive Order, based on the Court's preliminary finding that Plaintiffs demonstrated a sufficient likelihood of succeeding on their claim that the Executive Order violates the Establishment Clause. *See* TRO 41–42. The Court concluded, based upon the showing of constitutional injury and irreparable harm, the balance of equities, and public interest, that Plaintiffs met their burden in seeking a TRO, and directed the parties to submit a stipulated briefing and preliminary injunction hearing schedule. *See* TRO 42–43.

On March 21, 2017, Plaintiffs filed the instant Motion (ECF No. 238) seeking to convert the TRO to a preliminary injunction prohibiting Defendants from enforcing and implementing Sections 2 and 6 of the Executive Order until the matter is fully decided on the merits. They argue that both of these sections are unlawful in all of their applications and that both provisions are motivated by anti-Muslim animus. Defendants oppose the Motion. *See* Govt. Mem. in Opp'n to Mot. to Convert TRO to Prelim. Inj., ECF No. 251. After full briefing and notice to the parties, the Court held a hearing on the Motion on March 29, 2017.

DISCUSSION

The Court's TRO details why Plaintiffs are entitled to preliminary injunctive relief. *See* TRO 15–43. The Court reaffirms and incorporates those findings and conclusions here, and addresses the parties' additional arguments on Plaintiffs' Motion to Convert.

I. Plaintiffs Have Demonstrated Standing At This Preliminary Phase

The Court previously found that Plaintiffs satisfied Article III standing requirements at this preliminary stage of the litigation. *See* TRO 15–21 (State), 22–25 (Dr. Elshikh). The Court renews that conclusion here.

A. Article III Standing

Article III, Section 2 of the Constitution permits federal courts to consider only "cases" and "controversies." *Massachusetts v. EPA*, 549 U.S. 497, 516 (2007). "[T]o satisfy Article III's standing requirements, a plaintiff must show (1) it has suffered an 'injury in fact' that is (a) concrete and particularized and (b) actual or imminent, not conjectural or hypothetical; (2) the injury is fairly traceable to the challenged action of the defendant; and (3) it is likely, as opposed to merely speculative, that the injury will be redressed by a favorable decision." *Friends of the Earth, Inc. v. Laidlaw Envtl. Servs. (TOC), Inc.*, 528 U.S. 167, 180–81 (2000) (quoting *Lujan v. Defs. of Wildlife*, 504 U.S. 555, 560–61 (1992)).

"At this very preliminary stage of the litigation, the [Plaintiffs] may rely on the allegations in their Complaint and whatever other evidence they submitted in support of their TRO motion to meet their burden." *Washington*, 847 F.3d at 1159 (citing *Lujan*, 504 U.S. at 561). "With these allegations and evidence, the [Plaintiffs] must make a 'clear showing of each element of standing.'" *Id.* (quoting

Townley v. Miller, 722 F.3d 1128, 1133 (9th Cir. 2013), *cert. denied*, 134 S. Ct. 907 (2014)). On the record presented at this preliminary stage of the proceedings, Plaintiffs meet the threshold Article III standing requirements.

B. The State Has Standing

For the reasons stated in the TRO, the State has standing based upon injuries to its proprietary interests. *See* TRO 16–21.[2]

The State sufficiently identified monetary and intangible injuries to the University of Hawaii. *See, e.g.*, Suppl. Decl. of Risa E. Dickson, Mot. for TRO, Ex. D-1, ECF No. 66-6; Original Dickson Decl., Mot. for TRO, Ex. D-2, ECF No. 66-7. The Court previously found these types of injuries to be nearly indistinguishable from those found sufficient to confer standing according to the Ninth Circuit's *Washington* decision. *See* 847 F.3d at 1161 ("The necessary connection can be drawn in at most two logical steps: (1) the Executive Order prevents nationals of seven countries from entering Washington and Minnesota; (2) as a result, some of these people will not enter state universities, some will not join those universities as faculty, some will be prevented from performing research, and some will not be permitted to return if they leave. And we have no difficulty concluding that the States' injuries would be redressed if they could obtain the relief they ask for: a declaration that the Executive Order violates the Constitution and an injunction barring its enforcement."). The State also presented evidence of injury to its tourism industry. *See, e.g.*, SAC ¶ 100; Suppl. Decl. of Luis P. Salaveria, Mot. for TRO, Ex. C-1, ECF No. 66-4; Suppl. Decl. of George Szigeti, ¶¶ 5–8, Mot. for TRO, Ex. B-1, ECF No. 66-2.

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[2]The Court once again does not reach the State's alternative standing theory based on protecting the interests of its citizens as *parens patriae*. *See Washington*, 847 F.3d at 1168 n.5 ("The States have asserted other proprietary interests and also presented an alternative standing theory based on their ability to advance the interests of their citizens as *parens patriae*. Because we conclude that the States' proprietary interests as operators of their public universities are sufficient to support standing, we need not reach those arguments.").

For purposes of the instant Motion, the Court concludes that the State has preliminarily demonstrated that: (1) its universities will suffer monetary damages and intangible harms; (2) the State's economy is likely to suffer a loss of revenue due to a decline in tourism; (3) such harms can be sufficiently linked to the Executive Order; and (4) the State would not suffer the harms to its proprietary interests in the absence of implementation of the Executive Order. *See* TRO 21. These preliminary findings apply to each of the challenged Sections of the Executive Order. Accordingly, at this early stage of the litigation, the State has satisfied the requirements of Article III standing.

C. Dr. Elshikh Has Standing

Dr. Elshikh likewise has met his preliminary burden to establish standing to assert an Establishment Clause violation. *See* TRO 22–25. "The standing question, in plain English, is whether adherents to a religion have standing to challenge an official condemnation by their government of their religious views[.] Their 'personal stake' assures the 'concrete adverseness' required." *See Catholic League for Religious & Civil Rights v. City & Cty. of San Francisco*, 624 F.3d 1043, 1048–49 (9th Cir. 2010) (en banc). Dr. Elshikh attests that the effects of the Executive Order are "devastating to me, my wife and children." Elshikh Decl. ¶ 6, Mot. for TRO, Ex. A, ECF No. 66-1; *see also id.* ¶¶ 1, 3 ("I am deeply saddened . . . . by the message that both [Executive Orders] convey—that a broad travel-ban is 'needed' to prevent people from certain Muslim countries from entering the United States."); SAC ¶ 90 ("Muslims in the Hawai'i Islamic community feel that the new Executive Order targets Muslim citizens because of their religious views and national origin. Dr. Elshikh believes that, as a result of the new Executive Order, he and members of the Mosque will not be able to associate as freely with those of other faiths."). The alleged injuries are sufficiently personal, concrete, particularized, and actual to confer standing in the Establishment Clause context. *E.g.,* SAC ¶¶ 88–90; Elshikh Decl. ¶¶ 1, 3. These injuries have already occurred and will continue to occur if the Executive Order is implemented and enforced; the injuries are neither contingent nor speculative.

The final two aspects of Article III standing—causation and redressability—are also satisfied with respect to each of the Executive Order's challenged Sections. Dr. Elshikh's injuries are traceable to the new Executive Order and, if Plaintiffs prevail, a decision enjoining portions of the Executive Order would redress that injury. *See Catholic League*, 624 F.3d at 1053. At this preliminary stage of the litigation, Dr. Elshikh has accordingly carried his burden to establish standing under Article III.

The Court turns to the factors for granting preliminary injunctive relief.

II. Legal Standard: Preliminary Injunctive Relief

The underlying purpose of a preliminary injunction is to preserve the status quo and prevent irreparable harm. *Granny Goose Foods, Inc. v. Bhd. of Teamsters & Auto Truck Drivers Local No. 70*, 415 U.S. 423, 439 (1974); *see also Reno Air Racing Ass'n v. McCord*, 452 F.3d 1126, 1130–31 (9th Cir. 2006).

The Court applies the same standard for issuing a preliminary injunction as it did when considering Plaintiffs' Motion for TRO. *See Stuhlbarg Int'l Sales Co. v. John D. Brush & Co.*, 240 F.3d 832, 839 n.7 (9th Cir. 2001). A "plaintiff seeking a preliminary injunction must establish that he is likely to succeed on the merits, that he is likely to suffer irreparable harm in the absence of preliminary relief, that the balance of equities tips in his favor, and that an injunction is in the public interest." *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008) (citation omitted).

The Court, in its discretion, may convert a temporary restraining order into a preliminary injunction. *See, e.g.*, *ABX Air, Inc. v. Int'l Bhd. of Teamsters*, No. 1:16-CV-1096, 2016 WL 7117388, at *5 (S.D. Ohio Dec. 7, 2016) (granting motion to convert TRO into a preliminary injunction because "Defendants fail to allege any material fact suggesting that, if a hearing were held, this Court would reach a different outcome"; "[n]othing has occurred to alter the analysis in the Court's original TRO, and since this Court has already complied with the requirements for the issuance of a preliminary injunction, it can simply convert the nature of its existing Order."); *Productive People, LLC v. Ives Design*, No. CV-09-1080-PHX-GMS, 2009 WL 1749751, at *3 (D. Ariz. June 18, 2009) ("Because Defendants have given the Court no reason to alter the conclusions provided in its previous Order [granting a TRO], and because '[t]he standard for issuing a temporary restraining order is identical to the standard for issuing a preliminary injunction,' the Court will enter a preliminary injunction." (quoting *Brown Jordan Int'l, Inc. v. Mind's Eye Interiors, Inc.*, 236 F. Supp. 2d 1152, 1154 (D. Haw. 2002))). Here, the parties were afforded notice, a full-briefing on the merits, and a hearing both prior to entry of the original TRO and prior to consideration of the instant Motion.

For the reasons that follow and as set forth more fully in the Court's TRO, Plaintiffs have met their burden here.

III. Analysis of Factors: Likelihood of Success on the Merits

The Court's prior finding that Plaintiffs sufficiently established a likelihood of success on the merits of their Count I claim that the Executive Order violates the Establishment Clause remains undisturbed. *See* TRO 30–40.[3]

A. Establishment Clause

Lemon v. Kurtzman, 403 U.S. 602, 612–13 (1971), provides the benchmark for evaluating whether governmental action is consistent with or at odds with the Establishment Clause. According to *Lemon*, government action (1) must have a primary secular purpose, (2) may not have the principal effect of advancing or inhibiting religion, and (3) may not foster excessive entanglement with religion. *Id.* "Failure to satisfy any one of the three prongs of the *Lemon* test is sufficient to invalidate the challenged law or practice." *Newdow v. Rio Linda Union Sch. Dist.*, 597 F.3d 1007, 1076–77 (9th Cir. 2010).

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[3]The Court again expresses no view on Plaintiffs' additional statutory or constitutional claims.

The Court determined in its TRO that the preliminary evidence demonstrates the Executive Order's failure to satisfy *Lemon*'s first test. *See* TRO 33–36. The Court will not repeat that discussion here. As no *new* evidence contradicting the purpose identified by the Court has been submitted by the parties since the issuance of the March 15, 2017 TRO, there is no reason to disturb the Court's prior determination.

Instead, the Federal Defendants take a different tack. They once more urge the Court not to look beyond the four corners of the Executive Order. According to the Government, the Court must afford the President deference in the national security context and should not "'look behind the exercise of [the President's] discretion' taken 'on the basis of a facially legitimate and bona fide reason.'" Govt. Mem. in Opp'n to Mot. for TRO 42–43 (quoting *Kliendienst v. Mandel*, 408 U.S. 753, 770 (1972)), ECF No. 145. No binding authority, however, has decreed that Establishment Clause jurisprudence ends at the Executive's door. In fact, *every court* that has considered whether to apply the Establishment Clause to either the Executive Order or its predecessor (regardless of the ultimate outcome) has done so.[4] Significantly, this Court is constrained by the binding precedent and guidance offered in *Washington*. There, citing *Lemon*, the Ninth Circuit clearly indicated that the Executive Order is subject to the very type of secular purpose review conducted by this Court in considering the TRO. *Washington*, 847 F.3d at 1167–68; *id.* at 1162 (stating that *Mandel* does not apply to the "promulgation of sweeping immigration policy" at the "highest levels of the political branches").

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[4] *See Sarsour v. Trump*, No. 1:17-cv-00120 AJT-IDD, 2017 WL 1113305, at *11 (E.D. Va. Mar. 27, 2017) ("[T]he Court rejects the Defendants' position that since President Trump has offered a legitimate, rational, and non-discriminatory purpose stated in EO-2, this Court must confine its

The Federal Defendants' arguments, advanced from the very inception of this action, make sense from this perspective—where the "historical context and 'the specific sequence of events leading up to'" the adoption of the challenged Executive Order are as full of religious animus, invective, and obvious pretext as is the record here, it is no wonder that the Government urges the Court to altogether ignore that history and context. *See McCreary Cty. v. Am. Civil Liberties Union of Ky.*, 545 U.S. 844, 862 (2005). The Court, however, declines to do so. *Washington*, 847

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analysis of the constitutional validity of EO-2 to the four corners of the Order.") (citations omitted); *Int'l Refugee Assistance Project v. Trump*, No. TDC-17-0361, 2017 WL 1018235, at *16 (D. Md. Mar. 16, 2017) ("Defendants argue that because the Establishment Clause claim implicates Congress's plenary power over immigration as delegated to the President, the Court need only consider whether the Government has offered a 'facially legitimate and bona fide reason' for its action. *Mandel*, 408 U.S. at 777 . . . . [A]lthough '[t]he Executive has broad discretion over the admission and exclusion of aliens,' that discretion 'may not transgress constitutional limitations,' and it is 'the duty of the courts' to 'say where those statutory and constitutional boundaries lie.' *Abourezk[v. Reagan]*, 785 F.2d [1043,] 1061 [(D.C. Cir. 1986)]."); *Aziz v. Trump*, No. 1:17-CV-116 LMB-TCB, 2017 WL 580855, at *8 (E.D. Va. Feb. 13, 2017) ("Moreover, even if Mandel[, 408 U.S. at 770,] did apply, it requires that the proffered executive reason be 'bona fide.' As the Second and Ninth Circuits have persuasively held, if the proffered 'facially legitimate' reason has been given in 'bad faith,' it is not 'bona fide.' *Am. Academy of Religion v. Napolitano*, 573 F.3d 115, 126 (2d Cir. 2009); *Bustamante v. Mukasey*, 531 F.3d 1059, 1062 (9th Cir. 2008). That leaves the Court in the same position as in an ordinary secular purpose case: determining whether the proffered reason for the EO is the real reason.")).

F.3d at 1167 ("It is well established that evidence of purpose beyond the face of the challenged law may be considered in evaluating Establishment and Equal Protection Clause claims."). The Court will not crawl into a corner, pull the shutters closed, and pretend it has not seen what it has.[5] The Supreme Court and this Circuit both dictate otherwise, and that is the law this Court is bound to follow.

B. Future Executive Action

The Court's preliminary determination does not foreclose future Executive action. The Court recognizes that it is not the case that the Administration's past conduct must forever taint any effort by it to address the security concerns of the nation. *See* TRO 38–39. Based upon the preliminary record available, however, one cannot conclude that the actions taken during the interval between revoked Executive Order No. 13,769 and the new Executive Order represent "*genuine* changes in constitutionally significant conditions." *McCreary*, 545 U.S. at 874 (emphasis added).

The Government emphasizes that "the Executive Branch revised the new Executive Order to avoid any Establishment Clause concerns," and, in particular, removed the preference for religious minorities provided in Executive Order No. 13,769. Mem. in Opp'n 21, ECF No. 251. These efforts, however, appear to be precisely what Plaintiffs characterize them to be: efforts to "sanitize [Executive Order No. 13,769's] refugee provision in order to 'be responsive to a lot of very technical issues that were brought up by the court.'" Mem. in Supp. of Mot. to Convert TRO to Prelim. Inj. 20, ECF No. 238-1 [hereinafter PI Mem.] (quoting SAC ¶ 74(a)). Plaintiffs also direct the Court to the President's March 15, 2017 description of the Executive Order as "a watered-down version of the first one." PI Mem. 20 (citing Katyal Decl. 7, Ex. A, ECF No. 239-1). "[A]n implausible claim that governmental purpose has changed should not carry the day in a court of law any more than in a head with common sense." *McCreary*, 545 U.S. at 874.

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[5]*See Int'l Refugee Assistance Project*, 2017 WL 1018235, at *14 ("Defendants have cited no authority concluding that a court assessing purpose under the Establishment Clause may consider only statements made by government employees at the time that they were government employees. Simply because a decisionmaker made the statements during a campaign does not wipe them from the 'reasonable memory' of a 'reasonable observer.'" (quoting *McCreary*, 545 U.S. at 866)).

IV. Analysis of Factors: Irreparable Harm

Irreparable harm may be *presumed* with the finding of a violation of the First Amendment. *See Klein v. City of San Clemente*, 584 F.3d 1196, 1208 (9th Cir. 2009) ("The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury." (quoting *Elrod v. Burns*, 427 U.S. 347, 373 (1976))). Because Dr. Elshikh is likely to succeed on the merits of his Establishment Clause claim, the Court finds that the second factor of the *Winter* test is satisfied—that Dr. Elshikh is likely to suffer irreparable, ongoing, and significant injury in the absence of a preliminary injunction. *See* TRO 40 (citing SAC ¶¶ 88–90; Elshikh Decl. ¶¶ 1, 3).

V. Analysis of Factors: Balance of Equities And Public Interest

The final step in determining whether to grant Plaintiffs' Motion is to assess the balance of equities and examine the general public interests that will be affected. The Court acknowledges Defendants' position that the Executive Order is intended "to protect the Nation from terrorist activities by foreign nationals admitted to the United States[.]" Exec. Order, preamble. National security is unquestionably of vital importance to the public interest. The same is true with respect to affording appropriate deference to the President's constitutional and statutory responsibilities to set immigration policy and provide for the national defense. Upon careful consideration of the totality of the circumstances, however, the Court reaffirms its prior finding that the balance of equities and public interest weigh in favor of maintaining the status quo. As discussed above and in the TRO, Plaintiffs have shown a strong likelihood of succeeding on their claim that the Executive Order violates First Amendment rights under the Constitution. *See* TRO 41–42; *see also Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th Cir. 2012) ("[I]t is *always* in the public interest to prevent the violation of a party's constitutional rights." (emphasis added) (citing *Elrod*, 427 U.S. at 373)).

VI. Scope of Preliminary Injunction: Sections 2 And 6

Having considered the constitutional injuries and harms discussed above, the balance of equities, and public interest, the Court hereby grants Plaintiffs' request to convert the existing TRO into a preliminary injunction. The requested nationwide relief is appropriate in light of the likelihood of success on Plaintiffs' Establishment Clause claim. *See, e.g., Texas v. U.S.*, 809 F.3d 134, 188 (5th Cir. 2015) ("[Because] the Constitution vests [district courts] with 'the judicial Power of the United States' . . . , [i]t is not beyond the power of the court, in appropriate circumstances, to issue a nationwide injunction." (citing U.S. Const. art. III, § 1)), *aff'd by an equally divided Court*, 136 S. Ct. 2271 (2016); *see also Washington*, 847 F.3d at 1167 ("Moreover, even if limiting the geographic scope of the injunction would be desirable, the Government has not proposed a workable alternative form of the TRO that accounts for the nation's multiple ports of entry and interconnected transit system and that would protect the proprietary interests of the States at issue here while nevertheless applying only within the States' borders.").

The Government insists that the Court, at minimum, limit any preliminary injunction to Section 2(c) of the Executive Order. It makes little sense to do so. That is because the entirety of the Executive Order runs afoul of the Establishment Clause where "openly available data support[] a commonsense conclusion that a religious objective permeated the government's action," and not merely the promulgation of Section 2(c). *McCreary*, 545 U.S. at 863; *see* SAC ¶¶ 36–38, 58, 107; TRO 16, 24–25, 42. Put another way, the historical context and evidence relied on by the Court, highlighted by the comments of the Executive and his surrogates, does not parse between Section 2 and Section 6, nor does it do so between subsections within Section 2. Accordingly, there is no basis to narrow the Court's ruling in the manner requested by the Federal Defendants.[6] *See Church of the Lukumi Babalu Aye, Inc. v. City of Hialeah*, 508 U.S. 520, 539–40 (1993) ("[It would be] implausible to suggest that [Section 2(c)] but not the [other Sections] had as [its] object the suppression of [or discrimination against a] religion. . . . We need not decide whether the Ordinance 87–72 could survive constitutional scrutiny if it existed separately; it must be invalidated because it functions, with the rest of the enactments in question, to suppress Santeria religious worship.").

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[6]Plaintiffs further note that the Executive Order "bans refugees at a time when the publicized refugee crisis is focused on Muslim-majority nations." Reply in Supp. of Mot. to Convert TRO to Prelim. Inj. 14. Indeed, according to Pew Research Center analysis of data from the State Department's Refugee Processing Center, a total of 38,901 Muslim refugees entered the United States in fiscal year 2016, accounting for nearly half of the almost 85,000 refugees who entered the country during that period. *See* Br. of Chicago, Los Angeles, New York, Philadelphia, & Other Major Cities & Counties as Amici Curiae in Supp. of Pls.' Mot. to Convert TRO to Prelim. Inj. 12, ECF No. 271-1 (citing Phillip Connor, *U.S. Admits Record Number of Muslim Refugees in 2016*, Pew Research Center (Oct. 5, 2016), http://www.pewresearch.org/fact-tank/2016/10/05/u-s-admits-record-number-ofmuslim-refugees-in-2016). "That means the U.S. has admitted the highest number of Muslim refugees of any year since date of self-reported religious affiliations first became publicly available in 2002." *Id.*

The Court is cognizant of the difficult position in which this ruling might place government employees performing what the Federal Defendants refer to as "inward-facing" tasks of the Executive Order. Any confusion, however, is due in part to the Government's failure to provide a workable framework for narrowing the scope of the enjoined conduct by specifically identifying those portions of the Executive Order that are in conflict with what it merely argues are "internal governmental communications and activities, most if not all of which could take place in the absence of the Executive Order but the status of which is now, at the very least, unclear in view of the current TRO." Mem. in Opp'n 29. The Court simply cannot discern, on the present record, a method for determining which enjoined provisions of the Executive Order are causing the alleged confusion asserted by the Government. *See, e.g.*, Mem. in Opp'n 28 ("[A]n internal review of procedures obviously can take place independently of the 90-day suspension-of-entry provision (though doing so would place additional burdens on the Executive Branch, which is one of the several reasons for the 90-day suspension (citing Exec. Order No. 13,780, § 2(c)). Without more, "even if the [preliminary injunction] might be overbroad in some respects, it is not our role to try, in effect, to rewrite the Executive Order." *Washington*, 847 F.3d at 1167.

CONCLUSION

Based on the foregoing, Plaintiffs' Motion to Convert Temporary Restraining Order to A Preliminary Injunction is hereby GRANTED.

PRELIMINARY INJUNCTION

It is hereby ADJUDGED, ORDERED, and DECREED that:

Defendants and all their respective officers, agents, servants, employees, and attorneys, and persons in active concert or participation with them, are hereby enjoined from enforcing or implementing Sections 2 and 6 of the Executive Order across the Nation. Enforcement of these provisions in all places, including the United States, at all United States borders and ports of entry, and in the issuance of visas is prohibited, pending further orders from this Court.

No security bond is required under Federal Rule of Civil Procedure 65(c).

The Court declines to stay this ruling or hold it in abeyance should an appeal of this order be filed.

IT IS SO ORDERED.

Dated: March 29, 2017 at Honolulu, Hawai'i.

UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

Derrick K. Watson
United States District Judge

State of Hawaii, et al. v. Trump, et al.; Civ. No. 17-00050 DKW-KSC; **ORDER GRANTING MOTION TO CONVERT TEMPORARY RESTRAINING ORDER TO A PRELIMINARY INJUNCTION**

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

Case No. 1:17-cv-116

Tareq Aqel Mohammed Aziz
and
Ammar Aqel Mohammed Aziz,
by their next friend,
Aqel Muhammad Aziz,
and
John Does 1-60,

Date: January 28, 2017

Petitioners,

v.

DONALD TRUMP, President of the United States; U.S. DEPARTMENT OF HOMELAND SECURITY ("DHS"); U.S. CUSTOMS AND BORDER PROTECTION ("CBP"); JOHN KELLY, Secretary of DHS; KEVIN K. MCALEENAN, Acting Commissioner of CBP; and WAYNE BIONDI, Customs and Border Protection (CBP) Port Director of the Area Port of Washington Dulles,

Respondents.

TEMPORARY RESTRAINING ORDER

Pursuant to Federal Rule of Civil Procedure 65, the Court orders that:

a) respondents shall permit lawyers access to all legal permanent residents being detained at Dulles International Airport;

b) respondents are forbidden from removing petitioners—lawful permanent residents at Dulles International Airport—for a period of 7 days from the issuance of this Order.

Dates: January 28, 2017

/s/
Leonie M. Brinkema
United States District Judge

[redacted] A-3

CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellant Procedure 32(a)(7) and D.C. Circuit Rule 32(a)(1), the undersigned hereby certifies that this brief complies with the type-volume limitations of Federal Rule of Appellant Procedure 32(a)(7)(B).

1.. Exclusive of the exempted portions of the brief, as provided in Federal Rule of Appellant Procedure 32(a)(7)(B), the brief contains 26474 words.

2. The brief has been prepared in proportionally spaced typeface using Microsoft Word 2010 in 14 point Times New Roman font. As permitted by Federal Rule of Appellate Procedure 32(a)(7)(C), the undersigned has relied upon the count feature of this word processing system in preparing this certificate.

Dated: 6/6/2017

Sharon Bridgewater –Pro Se
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CERTIFICATE OF SERVICE

I Sharon Bridgewater the Plaintiff/Petitioner/Appellant certify that I sent the following below parties:

A TRUE AND CORRECT COPY OF THE:
Petition for Review or Complaint / Brief
were sent by first class mail(in a properly-addressed envelope with postage duly paid) served before 5:00 p.m. on June 6, 2017 from Detroit, Michigan to the parties and/or attorneys of record for all parties in this action sent the true and correct copy to the addresses listed below:

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To: The Clerk of the Court for the UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

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I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that the foregoing is true and correct. Executed 6th day of June 2017 in Detroit, Michigan.

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